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CITY OF SUNNYVALE

The Heart of Silicon Valley

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

Stan J. Kawczynski
Mayor

In the Matter of)

Jim Roberts
Vice Mayor

**Advanced Television Systems
Impact Upon the Existing
Television Broadcast
Service and Public Safety
Communications in San Francisco
Bay Area**

) **MM Docket No. 87-268**

Landon Curt Noll
Councilmember

Robin N. Parker
Councilmember

Manuel Valerio
Councilmember

Sixth Further Notice of Proposed Rule Making

Pat Vorreiter
Councilmember

To: The Commission

Jack Walker
Councilmember

COMMENTS OF The City of Sunnyvale, California

INTRODUCTION/BACKGROUND

The City of Sunnyvale is located in the San Francisco Bay Area just north of San Jose. Sunnyvale's population is approximately 126,000, within the 24 square miles of the City.

Sunnyvale operates and maintains a four channel conventional Public Safety radio system in the UHF 480 MHz "T" (Television Band). Additionally, Santa Clara County Communications operates and maintains a Law Enforcement Mutual Aid radio system in the UHF 480 MHz "T" Band which serves all fifteen cities and the unincorporated areas within our County. Many of these cities also operate/maintain primary public safety radio systems in similar 480 MHz frequencies.

The City of Sunnyvale (and other cities within Santa Clara County) migrated to the 480 MHz frequencies in the 1970's due to the severe shortage of frequencies in the VHF frequency bands in the San Francisco

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Bay area and need for growth based on expanding populations. Congestion in all bands remains a serious challenge today.

The Commission's proposal to license Channel 18 on Mt. Sutro Tower with 3,770,000 watts of power and replace Channel 14 with a new channel 15 at its existing site but with increased power to 163,000 watts appears to pose a serious interference threat to all public safety radio systems in this area assigned 480 MHz channels adjacent to these proposed channels.

COMMENTS

The City of Sunnyvale is extremely concerned with the proposal to license digital television transmitters on Channel 15 and Channel 18 in the San Francisco area. The high powers listed in the proposal pose a significant potential for interference to our City's Public Safety radio system. This is especially true for all receivers (City and County Wide Systems) operating adjacent to Channel 18. Although the commercial television providers would be charged with preventing or mitigating interference, as you know sometimes extensive amounts of public funds are expended investigating and proving the source of an interference problem. Mitigation or elimination of interference may not be practical or impossible to achieve. Past experience in other parts of the country where such interference has occurred resulted in years of problems with no effective resolution. The best approach would be to change these channel assignments to ones sufficiently removed from Channels 16 and 17 before implementation takes place.

A second concern to our City is the high probability of interference that the citizens of Sunnyvale could experience when they are tuned to the new Channel 15 or 18 (as proposed) and police or fire officers transmit from mobile or portable radios nearby. Essentially in this geographical area, law enforcement communications in most cities could cause interference when transmitting on Channel 16 and 17 while any citizens have their televisions tuned to Channel 15 or 18. This interference is also highly probable if any television receivers are located in the vicinity of any fixed (non-portable/mobile) transmitters located within the City. With fixed sites at over six locations within the city, residents located near those six sites would be impacted.

The City of Sunnyvale supports the concept of digital television. The City of Sunnyvale strongly recommends that the FCC assign television channels with a more substantial amount of separation from the Channel 16 and 17 public safety radio systems in this area to eliminate the grave threat of interference.

The Commission's proposal in a sense acknowledges the potential for interference by requiring a minimum of 176 km spacing between the DTV stations and any land mobile assignments. It appears that the proposed assignments of Channel 15 and 18 conflict with this required separation.

CONCLUSION/RECOMMENDATION

A serious interference threat is posed for the City of Sunnyvale's Public Safety communications system which supports fire, police and medical services for Sunnyvale residents and business. Additionally, the citizens of Sunnyvale would not be satisfied with constant interference when they attempted to watch these new channels and a police patrol vehicle transmitted near their house. For these reasons, the City of Sunnyvale strongly urges the Commission to reconsider the assignments of Channel 15 and 18 for television services in the San Francisco Bay Area. An earnest effort should be put forth to identify alternate channels with the required separation which would mutually serve DTV interests and public safety communications in this geographical area.

Thank you for your consideration of our views on this important issue.

Sincerely,



Stan Kawczynski, Mayor

cc: Senator Feinstein
Senator Boxer
Honorable Eshoo
Honorable Campbell